

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

ALEX HIXON,)	
)	
Plaintiff,)	
)	
v.)	No. 1:19-cv-00120-CLC-SKL
)	
TENNESSEE VALLEY AUTHORITY)	
BOARD OF DIRECTORS,)	
)	
Defendant.)	

OBJECTIONS TO DEFENDANT'S EXHIBIT LIST

Comes Plaintiff, through counsel, pursuant to Fed.R.Civ.P. 26(a)(3)(B), and hereby sets forth his objections to Defendant's exhibit list (Doc. 61) as follows:

EXHIBIT NO.	EXHIBIT DESCRIPTION	BASIS FOR OBJECTION
10	4/25/05 Letter with Return to Work Conditions	FRE 402, FRE 403
17	EEO Counselor's Report	FRE 802, FRE 402, FRE 403
18	EEO Complaint	FRE 802, FRE 402, FRE 403
32	Random Alcohol and Drug Testing Memo of Understanding	FRE 802, FRE 402
33	Hixon Medication List	Duplicative of Ex. 27
34	Email from Shahan to Cofer and Ortiz dated 5/30/14	FRE 802
35	Email from Shahan to Walls and Cofer dated 5/30/14	FRE 802
36	Email from Ortiz to Shahan dated 5/30/14	FRE 802
38	Email from Ortiz to Shahan dated 5/22/14	FRE 802
40	Dr. C. Adams patient file for Hixon	FRE 402, FRE 403, cumulative
41-42	Dr. Glover counseling notes for Hixon	FRE 402, FRE 403, cumulative
43	Dr. Sowell patient file for Hixon	FRE 402, FRE 403, cumulative, Motion in Limine (Doc. 52)
44-59	Social Security files and related documents	FRE 402, FRE 403, cumulative, Motion in Limine (Doc. 50)
60	Dr. Giorgadze notes	FRE 402, FRE 403, FRE 802

61	Dr. Brickman Psych Evaluation	FRE 402, FRE 403, FRE 802, Motion in Limine (Doc. 50)
62	Dr. Mullady Evaluation	FRE 402, FRE 403, FRE 802, Motion in Limine (Doc. 50)
63	Parkridge Valley Hospital records	FRE 402, FRE 403, FRE 802
64	Powell – EAP session notes	FRE 402, FRE 403, FRE 802
76-77	2005 FFD documents	FRE 402, FRE 403, cumulative
78-81	2013 FFD documents	FRE 402, FRE 403, cumulative
82-85	2005 FFD documents	FRE 402, FRE 403, cumulative
86	1/4/05 Letter from Mahan to Ortiz	FRE 402, FRE 403, FRE 802
87	12/3/04 Letter from Dr. Lilly to Ortiz	FRE 402, FRE 403, FRE 802
88-89	Letters from and to Moreno	FRE 402, FRE 403, FRE 802
96	Medication list	Duplicative of Ex. 27
100	Dronabinol Microdex	FRE 402, FRE 403, FRE 802; this document was pulled or accessed on 4/21/15
101	Dronabinol Drug Information	FRE 402, FRE 403, FRE 802; this document was pulled or accessed on 4/21/15
102-103	Documents related to Dr. Charles Adams lawsuit	FRE 402, FRE 403, Motion in Limine (Doc. 54)
104	Medical Review Officer Manual	FRE 802
105	Hixon's Prescription Lists	FRE 402, FRE 403, FRE 802
109-149	Dr. Glover progress notes	FRE 402, FRE 403, cumulative
151	Dr. C. Adams 10/1/12 exam note	FRE 402, FRE 403
152	Message from Hixon's mother 10/1/12	FRE 402, FRE 403, FRE 802
164-165	2019 Dr. C. Adams notes	FRE 402, FRE 403, cumulative
166-170	2015 Dr. C. Adams notes	FRE 402, FRE 403, cumulative
172-173	2001 Medical documents	FRE 402
174	3/18/04 Psychological FFD Tracking	FRE 402, FRE 403
175-192	2005 FFD documents	FRE 402, FRE 403, FRE 802, cumulative
193-199	FFD documents Oct. 2012 – Jan. 2013	FRE 402, FRE 403, FRE 802, cumulative
236	5/16/14 Email from Ortiz to Cofer	FRE 802

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November, 2020, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

By: s/ Doug S. Hamill